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Reply to
Attention Of

DEPARTMENT OF THE ARMY
BLUE GRASS ARMY DEPOT
2091 KINGSTON HIGHWAY
RICHMOND, KENTUCKY 40475-5060

August 30, 2005

Environmental Office

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PERMIT REVIEW BRANCH
DIVISION FOR AIR QUALITY

Mr. James Morse
Commonwealth of Kentucky
Department for Environmental Protection
Division for Air Quality
Permit Review Branch
803 Schenkel Lane
Frankfort, KY 40601-1403

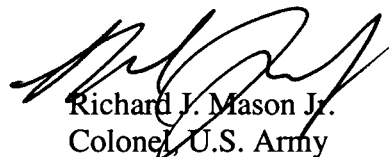
Subject: Blue Grass Army Depot and Bechtel Parsons Blue Grass
Technical Comments to Public Notice of the
Draft Air (Title V) Operating Permit
Blue Grass Army Depot, Richmond, Kentucky
EPA ID # KY8-213-820-105, AI 2805

Dear Mr. Morse:

Enclosed are Technical Comments to the Public Notice of the Draft Air (Title V) Operating Permit for the air emissions associated with the operation of Blue Grass Chemical Agent-Destruction Pilot Plant (BGCAPP) facility. The comments of Blue Grass Army Depot (BGAD) and the BGCAPP operator, Bechtel Parsons Blue Grass (BPBG) are consolidated in this submittal to the Division for Air Quality (DAQ), Kentucky Department for Environmental Protection (KDEP).

If you have any questions or require additional information, please contact Mr. Todd Williams at (859) 779-6280.

Sincerely,



Richard J. Mason Jr.
Colonel, U.S. Army
Commanding Officer

Enclosure

Copy Furnished:

Rick Shewekah, KDEP-DAQ
Brian Ballard, KDEP-DAQ
Thomas Kurkky, BPBG

Blue Grass Army Depot (BGAD)
and Bechtel Parsons Blue Grass (BPBG)
Technical Comments on Draft Air Quality Permit

Comment 1.

**Section B, Natural Gas/Oil Fired Boilers for 34.5 MMBTU/hr units,
Emissions Limitations**

Page 6 of 38, subsection 2.A, states that “particulate emissions shall not exceed 0.28 lb/MMBTU based on a three-hour-average”. The three-hour-average is not required by 401 KAR 59:015, Section 4 “Standards for Particulate Matter”. The only references to three-hour-averaging in 401 KAR 59:015 are in Section 7(b), which defines the method for measuring the excess emissions for sulfur dioxide and in Section 7(c), which specifies the method for nitrogen oxides. No requirement for three-hour-averaging is specified for particulate.

Furthermore, only boilers whose capacity is greater than 250MMBTU/hr require the three-hour-averaging. The capacity of CD02 (PB1) and CD03 (PB2) is only 34.5 MMBTU/hr.

Based on the above information, BGAD and BPBG recommend removing the three-hour-averaging requirement as shown below:

“2. Emission Limitations:

A. Pursuant to Regulation 401 KAR 59:015, Section 4(1) (c), particulate emissions shall not exceed 0.28 lb/MMBTU ~~based on a three-hour-average~~.

Blue Grass Army Depot (BGAD)
and Bechtel Parsons Blue Grass (BPBG)
Technical Comments on Draft Air Quality Permit

Comment 2.

**Section B, Natural Gas/Oil Fired Boilers for 34.5 MMBTU/hr units,
Emissions Limitations**

Page 7 of 38, subsection 2.C, discusses how compliance may be demonstrated for sulfur dioxide emissions. BGAD and BPBG believe the intent of this condition was to allow two alternative methods for compliance demonstration. BGAD and BPBG suggest adding an “or” in the following sentence in this condition to allow both methods of compliance demonstration:

“Compliance with the allowable sulfur dioxide emission limitation while burning distillate oil may be demonstrated based on fuel supplier certification of sulfur content ~~or~~ by using the following formula:”

Blue Grass Army Depot (BGAD)
and Bechtel Parsons Blue Grass (BPBG)
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Comment 3.

**Section B, Natural Gas/Oil Fired Boilers for 37.3 MMBTU/hr units,
Emissions Limitations**

Page 11 of 38, subsection 2.A, states that “particulate emissions shall not exceed 0.28 lb/MMBTU based on a three-hour-average”. The three-hour-average is not required by 401 KAR 59:015, Section 4 “Standards for Particulate Matter”. The only references to three-hour-averaging in 401 KAR 59:015 are in Section 7(b), which defines the method for measuring the excess emissions for sulfur dioxide and in Section 7(c), which specifies the method for nitrogen oxides. No requirement for three-hour-averaging is specified for particulate.

Furthermore, only boilers whose capacity is greater than 250MMBTU/hr require the three-hour-averaging. The capacity of CD04 (SB1) and CD05 (SB2) is 37.3 MMBTU/hr.

Based on the above information, BGAD and BPBG recommend removing the three-hour-averaging requirement as shown below:

“2. Emission Limitations:

A. Pursuant to Regulation 401 KAR 59:015, Section 4(1) (c), particulate emissions shall not exceed 0.28 lb/MMBTU ~~based on a three-hour-average~~.

Blue Grass Army Depot (BGAD)
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Comment 4.

Section G, General Provisions

On page 34 of 38, subsection (d) lists the emission unit numbers as 23, 24, 25, 26, 27, 28, 29, 30, 31, 32 and 33. The emission unit numbers need to be updated to reflect the new nomenclature, CD01 through CD11.

BGAD and BPPG recommend the following change:

“Pursuant to a duly submitted application the Kentucky Division for Air Quality hereby authorizes the construction of the equipment described herein, emission units ~~23, 24, 25, 26, 27, 28, 29, 30, 31, 32, and 33~~ CD01, CD02, CD03, CD04, CD05, CD06, CD07, CD08, CD09, CD10, and CD11, in accordance with the terms and conditions of this permit.”

Blue Grass Army Depot (BGAD)
and Bechtel Parsons Blue Grass (BPBG)
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Comment 5.

Section I, Compliance Schedule

On page 38 of 38 the Compliance Schedule requires the submittal of “the Operating Plan not less than eighteen months prior to beginning demilitarization operations”. BGAD and BPBG request that the Operating Plan be submitted not less than 6 months prior to the start of operations to be consistent with the submittal of the Destruction Efficiency Test Plan to the Division of Waste Management as discussed in Appendix B, #19 of the RD&D Draft Permit. BGAD and BPBG request that this permit condition be modified as follows:

“The permittee shall submit an Operating Plan not less than ~~eighteen (18)~~ six (6) months prior to beginning demilitarization operations.”